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BAR NO. 8680

**UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF  
MONTANA**

IN RE	)	
	)	CASE NO. 11-61284-7
LESLIE KAY THOMPSON,	)	
	)	ADVERSARY CASE
DEBTOR.	)	NO.:_____
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LESLIE KAY THOMPSON,	)	<b>COMPLAINT TO DETERMINE</b>
	)	<b>DISCHARGEABILITY</b>
PLAINTIFF,	)	
	)	
v.	)	
	)	
LOAN TO LEARN, MRS ASSOCIATES,	)	
NATIONAL COLLEGIATE TRUST, USFB)	)	
PRIVATE LOAN SPV, LLC, AND	)	
WELLS FARGO.	)	
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The DEBTOR and the PLAINTIFF, above-named, LESLIE KAY THOMPSON,  
respectfully alleges and states the following as her complaint:

1. Plaintiff is the Debtor in the above-entitled bankruptcy case.
2. This adversary action is being brought in connection with the Plaintiff's case under Chapter 7, Bankruptcy Case No. 11-61284-7.

3. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 157, § 1334 and 11 U.S.C. § 523. This is a core proceeding under 28 U.S.C. § 157(b)(2)(I).
4. As of the commencement of this case Debtor and Plaintiff was indebted to the Defendants as follows (totals are approximate as no proofs of claim have been filed as of today's date):
  - a. LOAN TO LEARN \$17,808.00
  - b. NATIONAL COLLEGIATE TRUST (FOUR LOANS) \$86,732.46
  - c. USFB PRIVATE LOAN SPV, LLC \$28,563.55
  - d. WELLS FARGO \$21,069.00
  - e. MRS ASSOCIATES is collecting at least some of the debts listed in b. and c.
5. The Plaintiff's debts to the Defendants are dischargeable pursuant to § 523(a)(8)(B) of Title 11 in that excepting the discharge of this indebtedness will impose an undue hardship upon the Plaintiff. The Plaintiff's hardship is based upon her income which has been between \$13,000 and \$21,000 for the past decade, her reasonable living expenses, her age, her being employed in the field she is trained for, and her having limited higher education herself. The debts at issue are all loans she co-signed for her son's college education.

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WHEREFORE the foregoing Debtor/Plaintiff prays the Court determine that the debts owed by the Plaintiff to the Defendants are dischargeable, and that this Court order such further relief as is just and appropriate.

Dated this 3<sup>rd</sup> day of October, 2011.

/S/ JENNIFER A. BEARDSLEY  
Attorney for the Debtor/Plaintiff

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